

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In Re:)	Case No. 17-42425-399
JUAN J. BUSTAMANTE and)	
HEATHER A. BUSTAMANTE,)	Chapter 13
)	
Debtors.)	

**MOTION FOR RELIEF FROM AUTOMATIC STAY TO NEGOTIATE MORTGAGE
LOAN MODIFICATION**

The Debtor(s), JUAN J. BUSTAMANTE and HEATHER A. BUSTAMANTE, file this Motion for Relief from Automatic Stay to Negotiate Mortgage Loan Modification (the “Motion”), and, in support thereof, would show the Court the following.

1. The Court has jurisdiction of this Motion pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and Local Rule 9.01(B)(1) of the United States District Court for the Eastern District of Missouri. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G).
2. The Debtor(s) seek to conduct negotiations with the Debtor’s(s’) current mortgage lender, Wells Fargo (the “Lender”), in an attempt to reach agreement on a modification of the loan secured by the Debtor’s(s’) residential real estate located at 1112 Marxhorns Place, Florissant, MO 63031. (the “Loan”).
3. The Debtor(s) request that the automatic stay of 11 U.S.C. §362(a) (the “Automatic Stay”) be lifted for the limited purpose of allowing Loan modification negotiations with the Lender to take place.
4. Should the Debtor(s) and the Lender reach an agreement on a Loan modification, the Debtor(s) will seek further relief from the Automatic Stay so that the Debtor(s) and the Lender may enter into the Loan modification. Such relief will be requested on no less than 14 days notice to the Chapter 13 Trustee.

WHEREFORE, premises considered, the Debtor(s) request that the Court grant the relief requested in this Motion and any other such relief to which the Debtor(s) may be entitled.

Respectfully Submitted,
ADAMS LAW GROUP

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically on October 23, 2018, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on Tuesday, October 23, 2018.

Kozney & McCubbin
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/s/ Melissa M. Collins
Melissa M. Collins, Paralegal